

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBIT ATTACHED HERETO	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants, Johnson & Johnson, Ethicon, Inc., and/or Ethicon LLC (collectively, the “Ethicon Defendants”), jointly move to dismiss with prejudice all claims against the Ethicon Defendants, pursuant to Fed. R. Civ. P. 41. No other defendants remain. Therefore, the Ethicon Defendants respectfully request the Court close this case and strike it from the docket. Each party shall bear her or its own costs.

Respectfully submitted,

/s/ Ellen A. Presby
Ellen A. Presby
Nemeroff Law Firm
2626 Cole Avenue
Suite 450
Dallas, TX 75204
(214) 774-2258
ellen@vanweylaw.com
Counsel for Plaintiff

/s/ William M. Gage
William M. Gage (MS Bar #8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com

/s/ Susan M. Robinson

Susan M. Robinson (W. Va. Bar #5169)

Thomas Combs & Spann PLLC

300 Summers Street

Suite 1380 (25301)

P.O. Box 3824

Charleston, WV 24338

(304) 414-1800

srobinson@tcspllc.com

Counsel for the Ethicon Defendants

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

EXHIBIT A

Civil Action No.	Case Name	
2:14-cv-26805	Mary G. Alexander	vs. Ethicon, Inc.; Johnson & Johnson
2:13-cv-15270	Leah Allen	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:14-cv-26021	Gwendline Callahan and William Callahan	vs. Ethicon, Inc.; Johnson & Johnson
2:15-cv-02310	Diana N. Dake	vs. Ethicon, Inc.; Johnson & Johnson
2:13-cv-21524	Cindy S. Davis	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:14-cv-08515	Jeannie J. DeSpain and Phillip E. DeSpain	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:13-cv-15267	Helen DosReis	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:13-cv-17418	Sheila R. Friedrich	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:14-cv-26881	Rachel D. Giron	vs. Ethicon, Inc.; Johnson & Johnson
2:14-cv-24754	Amelia T. Hawkins	vs. Ethicon, Inc.; Johnson & Johnson
2:13-cv-26134	Lisa R. Hott	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:16-cv-00016	Shirley F. Ingram	vs. Ethicon, Inc.; Johnson & Johnson
2:14-cv-19713	Mary F. Sizemore	vs. Ethicon, Inc.; Johnson & Johnson
2:15-cv-02341	Kathleen Spillman-Orel	vs. Ethicon, Inc.; Johnson & Johnson
2:14-cv-14348	Gloria J. Stock	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:13-cv-17424	Shannon Wielinga	vs. Ethicon, Inc.; Johnson & Johnson
2:16-cv-01897	Bertha Young	vs. Ethicon, Inc.; Johnson & Johnson